

2529 W. Belden Ave.
Chicago, IL 60647
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Chief, Standardization Branch
Livestock & Seed Program
MAS, USDA
Room 2603-S, Stop 0254
1400 Independence Ave., SW
Washington, DC 20250-0254

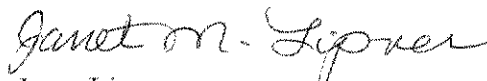
Re: Proposed Definitions for USDA Verified Claims

I am writing to urge you to change some phrases used in labeling to more accurately inform the consumer about the meat they purchase:

- Instead of "No subtherapeutic antibiotics added" or "Not fed antibiotics," please use "**Not administered antibiotics.**" Livestock can receive antibiotics by other means than feed.
- Instead of "Free Range, Free Roaming, or Pasture Raised," use "**Each individual animal shall have continuous, unconfined and unobstructed access to pasture throughout their life.**" Pasture should include "Vegetative cover and environment appropriate to the species in terms of diet and natural behavior." Also, "Animal density must be restricted so that animals can fulfill normal patterns of behavior and so that healthy pasture or range is maintained."
- Instead of "Grass fed," the USDA must require that "**Animals have had continuous unconfined and unobstructed access to grass- (including legumes and forbs) pasture throughout their life. When free-standing forage is unavailable during the winter season, cattle will continue to be fed on 85% forage-derived diet.**"

These recommendations are meant to clarify things and would remove loopholes that allow for exploitation by industry. Thank you for your time.

Sincerely,


Janet Lipner